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MAUMOYNIER and MATTHEW TURNER

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

ANTHONY BALBIANI, an individual, and
CHADWICK WALKER, an individual,

Plaintiffs,

v.

CHESTER PUBLIC UTILITY DISTRICT, INC.,
a local government entity;
MATTHEW MAUMOYNIER, an individual;
MATTHEW TURNER, an individual; BRIAN
LAYNE, an individual; and
DOES 1 –through 20, inclusive.

Defendants.

Case No.: 2:20–CV–02310–TLN–DMC

**JOINT STIPULATION AND ORDER TO
EXTEND DISCOVERY AND LAW AND
MOTION DEADLINES; ORDER**

Complaint Filed: November 19, 2020
Trial Date: None

Plaintiffs Anthony Balbiani and Chadwick Walker (collectively referred to as “Plaintiffs”), and Defendants Chester Public Utility District, Inc., Matthew Maumoynier, and Matthew Turner (collectively referred to as “Defendants”), by and through their attorneys hereby stipulate and seek Court approval for the following:

WHEREAS, the Parties’ Joint Status Report of February 21, 2021, and the Court’s Initial Pretrial Scheduling Order of November 19, 2020, provides deadlines of September 16, 2021, for non-expert discovery;

WHEREAS, the parties have engaged in initial exchange of written discovery requests and responses;

WHEREAS, on August 5, 2021, Defendants were affected by the city of Chester’s mandatory evacuation order due to the wildfires;

WHEREAS Defendants Matthew Maumoynier and Matthew Turner are firefighters currently fighting the wildfires in Northern California;

WHEREAS, the Parties have not completed written discovery or depositions, and considering the foregoing, a non-expert discovery deadline of September 16, 2021, will not provide the Parties sufficient

time to complete fact discovery before the cut-off;

WHEREAS, the Parties have agreed to extend the discovery cut-off deadline; and

WHEREAS, a trial date has not been set;

STIPULATION

THEREFORE, it is hereby stipulated and agreed by the parties, as follows:

1. The deadline for non-expert discovery shall be extended to May 2, 2022;
2. Expert disclosures shall be made by July 1, 2022 (60 days after close of discovery);
3. Dispositive motion shall be filed by October 31, 2022 (180 days after close of discovery); and
4. Joint Notice of Trial Readiness shall be filed by August 30, 2022 (120 days after close of discovery).

IT IS HEREBY STIPULATED

Date: August 24, 2021

LAW OFFICES OF TANYA GOMERMAN

By: /s/ Maria Bourn

Maria A. Bourn, Esq.
Attorney for PLAINTIFF
ANTHONY BALBIANI

Date: August 24, 2021

ALLEN, GLAESSNER, HAZELWOOD
AND WERTH, LLP

By: /s/ Steven Werth

Steven Werth, Esq.
Attorney for DEFENDANTS CHESTER
PUBLIC UTILITY DISTRICT and
BRIAN LAYNE

Date: August 24, 2021

MAIRE & DEEDON

By: /s/ Patrick Deedon

Patrick Deedon, Esq.
Attorney for DEFENDANTS MATTHEW
MAUMOYNIER and MATTHEW TURNER

ORDER

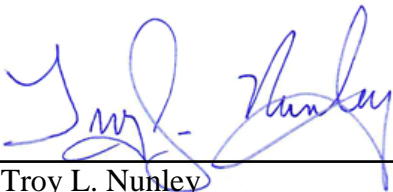
The stipulation is approved.

1 This Court has reviewed and considered the above stipulation among the Parties. For good cause
2 shown, it is hereby ordered as follows:

- 3 1. The deadline for non-expert discovery shall be extended to May 2, 2022;
- 4 2. Expert disclosures shall be made by July 1, 2022 (60 days after close of discovery);
- 5 3. Dispositive motion shall be filed by October 31, 2022 (180 days after close of
6 discovery); and
- 7 4. Joint Notice of Trial Readiness shall be filed by August 30, 2022 (120 days after close
8 of discovery).

9 IT IS SO ORDERED.

10
11 Dated: August 25, 2021



Troy L. Nunley
United States District Judge